

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Rooterman, LLC)	
)	
)	
<i>Plaintiff,</i>)	
)	
v.)	Civil Action No. 1:24-cv-13015
)	
Klodian Belegu, Quality Air Care)	
Corporation, RM Water Damage)	
Restoration LTD and 911 Sewer & Drain)	
Corporation.)	
<i>Defendants.</i>)	
)	

**PLAINTIFF'S SUPPLEMENTAL EXHIBITS FURTHER SUPPORTING PLAINTIFF'S
OPPOSITION TO DEFENDANTS' MOTION
FOR A PARTIAL STAY OF THE PRELIMINARY INJUNCTION**

Plaintiff Rooterman, LLC (“Rooterman” or “Plaintiff”) hereby files the attached supplemental exhibits in further support of Plaintiff’s Opposition to Defendants’ Motion for a Partial Stay of the Preliminary Injunction. Attached hereto, please find:

Exhibit 13: A screen shot of the 911 Sewer & Drain web page, as of today, April 22, 2025.

As the Court can readily see, “Water Damage Restoration” is part of the offerings of this defendant company that has been restrained by way of this Court’s April 11, 2025 Order.

Exhibit 14A: A Google Review from “5 days ago” dating after this Court’s April 11, 2025 Order that show that Defendants continue to do business and defy this Court’s Order as it reviews “Ron” and, notably, “Ron” is one of the plumbers who Plumbing Manager, Travis Hershner, identified. (See Exhibit 14.B (Hershner Depo. Excerpt, p.10)

Exhibit 15: Various “blog” posts on the 911 Sewer & Drain website dated after this Court’s April 11, 2025 Order up to today, April 22, 2025, that show that Defendants continued to advertise their services in defiance of this Court’s order.

Exhibit 16: A full copy of the “Home” page on the 911 Sewer & Drain website, as of today,

April 22, 2025.

Notably, when the telephone number on Exhibit 13 is dialed, 800-295-5798, a call center picks up, answers as “911 Sewer & Drain” and will openly schedule plumbing and drain services throughout New Jersey. This all continues to happen daily despite this Court’s Order of April 11, 2025 Ordering that Defendants cease and desist plumbing and sewer business for the 2 year period therein.

Based on these additional exhibits, this Court should not only maintain the Order as currently issued but issue a clear warning to Mr. Belegu that any continued failure to comply with it shall be met with substantial sanctions.

WHEREFORE, and for the further reasons set forth above, the Defendants’ Motion should be denied in its entirety.

Respectfully submitted,

ROOTERMAN, LLC

By its Counsel

Dated: April 22, 2025

/s/ Jeffrey Rosin

Jeffrey M. Rosin, BBO# 629216

Lisbeth Valdez, BBO# 715826

O’HAGAN MEYER, PLLC

140 Kendrick Street, Bldg. C West

Needham, MA 02494

Telephone: (617) 843-6800

Fax: (617) 843-6810

jrosin@ohaganmeyer.com

lvaldez@ohaganmeyer.com

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of April 2025, *Plaintiff's Supplemental Submission in Opposition to the Motion for a Partial Stay of the Preliminary Injunction* was electronically filed. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt.

/s/ Jeffrey Rosin
Jeffrey M. Rosin